



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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February 20, 2012

Via Electronic Mail

Elizabeth Thayer
Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670
ethayer@waterboards.ca.gov

Re: Comments on the Tentative Order Amending Order No. R5-2005-0040, Master Reclamation Permit for the City of Lincoln

Dear Ms. Thayer:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to submit these comments on the proposed order to amend Order No. R5-2005-0040 (NPDES No. CA0085103) (Proposed Order), which consists of a master reclamation permit for the City of Lincoln (Lincoln). CVCWA is a non-profit organization representing more than 50 publicly owned treatment works throughout the Central Valley Region in regulatory matters affecting surface water discharge, land application, and water reuse. We approach these matters with a perspective to balance environmental and economic interests consistent with state and federal law.

Accordingly, we support the Proposed Order and amendment of Lincoln's master reclamation permit to remove the NPDES requirements. As explained in the Proposed Order, tail water discharges that might occur are regulated under the Irrigated Lands Program and Lincoln's discharges to surface waters are regulated under Order No. R5-2008-0156 (NPDES No. CA0084476). Thus, continuing to regulate the tail water discharges under the master

reclamation permit is redundant, unnecessary to protect beneficial uses, and may create regulatory confusion.

Further, given the overlapping regulation of the subject discharges, removing such redundant, unnecessary, and potentially confusing requirements from the master reclamation permit is consistent with state policy for increasing recycled water use within California. For example, the State Water Resources Control Board's (State Water Board) strategic plan for the water boards includes a priority to increase sustainable local water supplies to meet existing and future beneficial uses by 1,725,000 acre-feet per year (afy) in excess of 2002 levels by 2015. (*Strategic Plan Update 2008-2012* (Sept. 2, 2008) at p. 21.) The State Water Board's 2009 *Recycled Water Policy* calls for increased recycled water use to counteract the collapse of the Bay-Delta ecosystem, climate change, severe drought on the Colorado River, failing Delta levees, and the state's continued population growth. (*Recycled Water Policy* (Feb. 3, 2009) at p. 1.) The policy establishes a statewide goal to increase the use of recycled water over 2002 levels by at least one million afy by 2020 and two million afy by 2030.

Thank you for your consideration of our comments and support for amending Lincoln's master reclamation permit to remove the NPDES requirements. If I can be of further assistance, do not hesitate to contact me at (530) 268-1338 or officer@cvcwa.org.

Sincerely,



Debbie Webster,
Executive Officer

cc: Pamela Creedon, Central Valley Regional Water Quality Control Board
(Via Electronic Mail: pcreedon@waterboards.ca.gov)